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### IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: : Case No. 16-70046-JAD

:

Merrett C Adams\* Linda Wolfe POA : Chapter 13

:

Debtor

•

Merrett C Adams\* Linda Wolfe POA,

Document No. 86

Movant

vs.

:

RONDA J. WINNECOUR, ESQ.

CHAPTER 13 TRUSTEE,

:

ADDITIONAL RESPONDENT

### NOTICE OF PROPOSED MODIFICATION TO CONFIRMED PLAN DATED NOVEMBER 25 2019

- 1. Pursuant to 11 U.S.C. § 1329, the Debtor(s) has filed an Amended Chapter 13 Plan dated February 10 2021, which is annexed hereto at Exhibit "A" (the "Amended Chapter 13 Plan"). A summary of the modification is set forth below in paragraphs 4 through 6 of this Notice.
- 2. All Objections to the Amended Chapter 13 Plan must be filed and served by no later than 21 days after the date of this Notice upon the Debtor(s), Chapter 13 Trustee and any creditor whose claim allowance or treatment is the subject of the Objection. Untimely Objections will not be considered. Any creditor who files a timely Objection to the Amended Chapter 13 Plan must appear at the scheduled Initial Confirmation Hearing on the Amended Chapter 13 Plan.
- 3. A virtual (via Zoom) Initial Confirmation Hearing on the Amended Chapter 13 Plan will be held on March 11, 2021, at 2:31 pm., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <a href="http://www.ch13pitt.com/calendar/">http://www.ch13pitt.com/calendar/</a> several days before the meeting. Parties are expected to familiarize themselves with the Trustee's website at <a href="http://www.ch13pitt.com/">http://www.ch13pitt.com/</a> and to comply with the procedures set forth at that site for conference participation.
- 4. Pursuant to the Amended Chapter 13 Plan, the Debtor(s) seeks to modify the Plan in the following particulars:

### Cure plan arrears and address notice of Default.

5. The proposed modification to the Plan will impact the treatment of the claims of the following creditors, and in the following particulars:

Cure plan arrears by increasing plan term. All other secured and unsecured creditors will be treated as in previous plan and orders of Court

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Debtor Merrett C. Adams Case number 16-70046-JAD

6. Debtor(s) submits that the reason(s) for the modification is (are) as follows:

Address Trustee Motion to Dismiss and cure plan arrears. Debtors family who funds the plan had suffered a loss of income in 2020 as a result of the pandemic which continued into 2021.

7. The Debtor(s) submits that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The Debtor(s) further submits that the proposed modification complies with 11 U.S.C. §§ 1322(a), 1322(b), 1325(a) and 1329 and, except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 Plan.

WHEREFORE, the Debtor(s) respectfully requests that the Court enter an Order confirming the Amended Chapter 13 Plan, and for such other relief the Court deems equitable and just.

RESPECTFULLY SUBMITTED, this 10th day of February 2021

/s/ Lawrence W Willis,
Esquire Lawrence W
Willis, Esquire PA I.D.
#85299
Willis &
Associates 201
Penn Center Blvd
Suite 310
Pittsburgh, PA 15235
412-702-1170

Email: urfreshstrt@gmail.com

PAWB Local Form 10 (12/17)

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| to identify your case:<br>lerrett C. Adams   |  |  |  |
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|  |  |  |  |
| irst Name Middle Name  | Last Name  |  |  |
| irst Name Middle Name  | Last Name  |  |  |
| tcy Court for the:   | WESTERN DISTRICT OF  | <b>✓</b> C   | Check if this is an amended plan, an   |
|  | PENNSYLVANIA   |  |  |
|  |  | li   | st below the sections of the plan the  |
| 6-70046-JAD  |  | h  | ave been changed.  |
|  |  | _  |  |
|  |  |  |  |
| -  |  |  |  |
| Dated: February 10, 2  | :020   |  |  |
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|  |  |  |  |
|  | -  | ner wise or dere   | a by the court   |
| he following notice to credi   | tors, you must check each box that applies   |  |  |
|  | FECTED BY THIS PLAN. YOUR CLAIM N  | MAY BE REDU  | CED, MODIFIED, OR  |
|  |  | nave one in this   | bankruptcy case. If you do not have  |
| UR ATTORNEY MUST FI<br>TE SET FOR THE CONF.<br>Y CONFIRM THIS PLAN   | ILE AN OBJECTION TO CONFIRMATION<br>IRMATION HEARING, UNLESS OTHERV<br>WITHOUT FURTHER NOTICE IF NO O  | N AT LEAST SA<br>WISE ORDER<br>BJECTION TO   | EVEN (7) DAYS BEFORE THE<br>ED BY THE COURT. THE COUR<br>O CONFIRMATION IS FILED.  |
|  |  |  |  |
| e s  | of particular importance. <b>Debtor</b> (s) <b>must chec</b> items. If the "Included" box is unchecked of er in the plan.  |  |  |
| ludes each of the following<br>be ineffective if set out late<br>e amount of any claim or  | items. If the "Included" box is unchecked of   | r both boxes ard   | e checked on each line, the provisi  |
| ludes each of the following be ineffective if set out late the amount of any claim or a payment or no payment to effectuate  | items. If the "Included" box is unchecked of er in the plan.  arrearages set out in Part 3, which may res the secured creditor (a separate action will sessory, nonpurchase-money security interes   | ult  | e checked on each line, the provisi  |
| ludes each of the following be ineffective if set out late amount of any claim or a payment or no payment to effectuate  f a judicial lien or nonpossetion 3.4 (a separate action  | items. If the "Included" box is unchecked of er in the plan.  arrearages set out in Part 3, which may res the secured creditor (a separate action will sessory, nonpurchase-money security interes will be required to effectuate such limit)  | ult Includ   | e checked on each line, the provisi  |
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| ludes each of the following be ineffective if set out late amount of any claim or a payment or no payment to effectuate  f a judicial lien or nonpossetion 3.4 (a separate action  | items. If the "Included" box is unchecked of er in the plan.  arrearages set out in Part 3, which may res the secured creditor (a separate action will sessory, nonpurchase-money security interes will be required to effectuate such limit)  | ult Includ   | e checked on each line, the provisi  |
| ludes each of the following be ineffective if set out late the amount of any claim or a payment or no payment to effectuate f a judicial lien or nonpossition 3.4 (a separate action provisions, set out in Part   | items. If the "Included" box is unchecked of er in the plan.  arrearages set out in Part 3, which may rest the secured creditor (a separate action will sessory, nonpurchase-money security interest will be required to effectuate such limit) to 9   | ult Includ   | e checked on each line, the provisi  |
| ludes each of the following be ineffective if set out late the amount of any claim or a payment or no payment to offectuate  f a judicial lien or nonpossication 3.4 (a separate action provisions, set out in Part ents and Length of Plan  | items. If the "Included" box is unchecked of er in the plan.  arrearages set out in Part 3, which may rest the secured creditor (a separate action will sessory, nonpurchase-money security interest will be required to effectuate such limit) to the trustee:  | ult  | e checked on each line, the provisi  |
| ludes each of the following be ineffective if set out late the amount of any claim or anyment or no payment to a judicial lien or nonpossicion 3.4 (a separate action provisions, set out in Part and Length of Plan ll make regular payments of \$600.00 per month for a set out in Part and Section 2. | items. If the "Included" box is unchecked of er in the plan.  arrearages set out in Part 3, which may rest the secured creditor (a separate action will sessory, nonpurchase-money security interest will be required to effectuate such limit) to the trustee:  a remaining plan term of 60 months shall be p   | ult Includes | led  Not Included  led  Not Included  led  Not Included  led  Not Included  led  Some sample of the provision of the provisio |
| ludes each of the following be ineffective if set out late the amount of any claim or a payment or no payment to offectuate  f a judicial lien or nonpossication 3.4 (a separate action provisions, set out in Part ents and Length of Plan  | items. If the "Included" box is unchecked of er in the plan.  arrearages set out in Part 3, which may rest the secured creditor (a separate action will sessory, nonpurchase-money security interest will be required to effectuate such limit) to the trustee:  | ult Includes | e checked on each line, the provisi  |
|  | is form sets out options that icate that the option is applings may not be confirmable the following notice to credit UR RIGHTS MAY BE AFILIMINATED.  It is should read this plan careful attorney, you may wish to confirm the confirmation of the co | of Pennsylvania Dated: February 10, 2020  is form sets out options that may be appropriate in some cases, but the case that the option is appropriate in your circumstances. Plans that ings may not be confirmable. The terms of this plan control unless of the following notice to creditors, you must check each box that applies  UR RIGHTS MAY BE AFFECTED BY THIS PLAN. YOUR CLAIM MIMINATED.  In should read this plan carefully and discuss it with your attorney if you hattorney, you may wish to consult one.  YOU OPPOSE THIS PLAN'S TREATMENT OF YOUR CLAIM OR A UR ATTORNEY MUST FILE AN OBJECTION TO CONFIRMATION TE SET FOR THE CONFIRMATION HEARING, UNLESS OTHERS BY CONFIRM THIS PLAN WITHOUT FURTHER NOTICE IF NO ON.   | 6-70046-JAD  by Pennsylvania Dated: February 10, 2020  is form sets out options that may be appropriate in some cases, but the presence of a licate that the option is appropriate in your circumstances. Plans that do not comply ings may not be confirmable. The terms of this plan control unless otherwise orderes the following notice to creditors, you must check each box that applies  UR RIGHTS MAY BE AFFECTED BY THIS PLAN. YOUR CLAIM MAY BE REDUMINATED.  It is should read this plan carefully and discuss it with your attorney if you have one in this limits and the plan carefully and discuss it with your attorney if you have one in this limits.   |

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| Debtor  |           | Merrett C. Adams  |  | Case number   | 16-70046-JAD   |   |  |
|---------|-----------|---|--|---|--|---|--|
| 2.2 Add | itional 1 | payments.   |  |   |  |   |  |
|         |           |   | he balance of \$ shall be fully  | naid by the Trustee to the Cle  | erk of the Bankruptcy cou  | rt form the first                                   |  |
|         |           | available funds.  | me durance of \$shair de rung  | paid by the Trustee to the Cie  | in of the Building to the  | t form the first                                    |  |
| Chec    | ck one.   |   |  |   |  |   |  |
|         | <b>V</b>  | None. If "None" is che  | cked, the rest of § 2.2 need not be  | completed or reproduced.  |  |   |  |
| 2.3     |           | tal amount to be paid into the plan (plan base) shall be computed by the trustee based on the total amount of plan payments |  |   |  |   |  |
|         |           | olus any additional sources of plan funding described above.  |  |   |  |   |  |
| Part 3: | Trea      | tment of Secured Claims   |  |   |  |   |  |
| 3.1     | Maint     | tenance of payments and   | cure of default, if any, on Long-  | Term Continuing Debts.  |  |   |  |
|         | Check     | one.  |  |   |  |   |  |
|         | <b>y</b>  | The debtor(s) will maint<br>required by the applicab<br>trustee. Any existing art<br>from the automatic stay                | ked, the rest of Section 3.1 need n<br>cain the current contractual installr<br>ele contract and noticed in conform<br>earage on a listed claim will be pa<br>is ordered as to any item of collate<br>paragraph as to that collateral will | nent payments on the secured of<br>nity with any applicable rules. I<br>nid in full through disbursement<br>ral listed in this paragraph, the | claims listed below, with a<br>These payments will be di<br>ts by the trustee, without i<br>en, unless otherwise order | sbursed by the interest. If relief ed by the court, |  |
| Name o  | of Credi  | itor  | Collateral   | Current installment payment   | Amount of arrearage (if any)   | Start date<br>(MM/YYYY)                             |  |
|         |           |   |  | (including escrow)<br>\$419.99*Amended  |  | ,   |  |
|         |           |   |  | Claim 2-2   |  |   |  |
|         |           |   | 658 Bethel Church Road   | 452.04 *Effective<br>9/9/18   |  |   |  |
|         |           |   | Marion Center, PA 15759<br>Indiana County  | 432.90* Effective   | 484.49   |   |  |
|         |           |   | Residence<br>Fair Market Value   | 9/1/19  | 10 11 10   |   |  |
| LSF9 N  |           | R PARTICIPATION   | Determined By  | \$435.91*   |  |   |  |
|         |           | claims as needed.   | Comparable Sales   | Effective 3/9/21  |  | -   |  |
| 3.2     | Reque     | est for valuation of securi   | ity, payment of fully secured clai   | ims, and modification of und  | ersecured claims.  |   |  |
|         | Check     | one.  |  |   |  |   |  |
|         | <b>V</b>  | None. If "None" is che  | cked, the rest of § 3.2 need not be  | completed or reproduced.  |  |   |  |
| 3.3     | Secur     | ed claims excluded from   | 11 U.S.C. § 506.   |   |  |   |  |
|         | Check     |   |  |   | _  |   |  |
| 2.4     | <b>V</b>  |   | cked, the rest of Section 3.3 need   | not be completed or reproduce   | d.   |   |  |
| 3.4     |           | nvoidance.  |  |   |  |   |  |
| Check o | ne.<br>✔  |   | ecked, the rest of § 3.4 need not be plicable box in Part 1 of this plan   |   | e remainder of this section  | n will be   |  |

3.5 Surrender of collateral.

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| Debtor           | Merrett C.   | Adams   |  | Case number         | 16-70046-JAD                                       |                        |
|------------------|--|---|--|---------------------|--|------------------------|
|                  | Check one.   |   |  |                     |  |                        |
|                  | ✓ None. If '   | "None" is checked, the rest                               | of § 3.5 need not be comple  | ted or reproduced.  |  |                        |
| 3.6              | Secured tax claim  | s.  |  |                     |  |                        |
| Name o           | f taxing authority   | Total amount of claim                                     | Type of tax  | Interest Rate*      | Identifying number(s) if collateral is real estate | Tax periods            |
| Indiana<br>Claim | County Tax<br>Bureau   | \$1155.30   | Description: (1-1)<br>property taxes   |                     |  |                        |
| Insert ad        | ditional claims as ne  | eeded.  |  |                     |  |                        |
|                  |  | he Internal Revenue Servic<br>of the date of confirmation | ee, Commonwealth of Penns  | ylvania and any ot  | her tax claimants shall bear                       | interest at            |
| Part 4:          | Treatment of Fee   | es and Priority Claims                                    |  |                     |  |                        |
| 4.1              | General  |   |  |                     |  |                        |
|                  | Trustee's fees and a in full without post  |   | including Domestic Suppor  | t Obligations other | than those treated in Section                      | on 4.5, will be paid   |
| 4.2              | Trustee's fees   |   |  |                     |  |                        |
|                  | and publish the pre  | vailing rate on the court's                               | y change during the course of<br>website. It is incumbent upon<br>e plan is adequately funded. |                     |  |                        |
| 4.3              | Attorney's fees.   |   |  |                     |  |                        |
|                  | Attorney's fees are payable to Lawrence W Willis Esq 85299. In addition to a retainer of \$1,000.00 (of which \$_0.00 was a payment to reimburse costs advanced and/or a no-look costs deposit) already paid by or on behalf of the debtor, the amount of \$3,000.00 is to be paid at the rate of \$428.57 per month. Including any retainer paid, a total of \$_4,000.00 in fees and costs reimbursement has been approved by the court to date, based on a combination of the no-look fee and costs deposit and previously approved application(s) for compensation above the no-look fee. An additional \$_1,000.00 will be sought through a fee application to be filed and approved before any additional amount will be paid through the plan, and this plan contains sufficient funding to pay that additional amount, without diminishing the amounts required to be paid under this plan to holders of allowed unsecured claims.  Check here if a no-look fee in the amount provided for in Local Bankruptcy Rule 9020-7(c) is being requested for services rendered to |   |  |                     |  |                        |
|                  |  | gh participation in the cour                              | t's Loss Mitigation Program  |                     |  |                        |
| 4.4              | Priority claims not  | t treated elsewhere in Par                                | t 4.   |                     |  |                        |
| Insert ad        | ✓ None. If 'ditional claims as ne  |   | of Section 4.4 need not be o   | completed or repro  | duced.   |                        |
| 4.5              | <b>Priority Domestic</b>   | Support Obligations not                                   | assigned or owed to a gove   | rnmental unit.      |  |                        |
|                  |  |   | tic Support Obligations thro<br>and remain current on all Do                                   |                     |  |                        |
|                  | Check here if the  | nis payment is for prepetition                            | on arrearages only.  |                     |  |                        |
|                  | f Creditor<br>the actual payee, e.ş  | Description<br>g. PA SCDU)                                | n  | Claim               | Mon<br>pro 1                                       | thly payment or<br>ata |
| None             |  |   |  |                     |  |                        |

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|-----------------------|---|--|--|--|--|---|
| Debtor                | -   | Merrett C. Adams   | 3  | _ Case number  | 16-70046-JAD   |   |
| Insert ad             | ditional  | claims as needed.  |  |  |  |   |
| 4.6                   | Domes<br>Check  | one.   | tions assigned or owed to a govern<br>is checked, the rest of § 4.6 need not   | <del>-</del>   | n full amount.   |   |
| 4.7                   | Priori  | ty unsecured tax cla   | ims paid in full.  |  |  |   |
|                       |   | ; authority  | Total amount of claim  | Type of Tax  | Interest rate<br>(0% If blank)   | Tax Periods   |
| -NONE                 | -   |  |  |  |  |   |
| Insert ad             | ditional  | claims as needed.  |  |  |  |   |
| Part 5:               | Treat   | ment of Nonpriorit   | y Unsecured Claims   |  |  |   |
| 5.1                   | Nonpr   | iority unsecured cla   | aims not separately classified.  |  |  |   |
|                       | Debtor  | r(s) ESTIMATE(S) to  | hat a total of \$0.00 will be available  | for distribution to nonpriority  | unsecured creditors.   |   |
|                       |   |  | GE(S) that a MINIMUM of \$0.00 shation set forth in 11 U.S.C. § 1325(a)  |  | cured creditors to comp  | ly with the liquidation                                     |
|                       | availab<br>estima<br>amoun<br>claims  | ole for payment to the<br>ted percentage of pay<br>t of allowed claims.<br>will be paid pro-rata | mated above is <i>NOT</i> the <i>MAXIMUN</i> ese creditors under the plan base will yment to general unsecured creditors. Late-filed claims will not be paid un a unless an objection has been filed we plan are included in this class. | be determined only after audi is <b>0.00</b> %. The percentage of pless all timely filed claims have | t of the plan at time of of bayment may change, but been paid in full. The | completion. The ased upon the total reafter, all late-filed |
| 5.2                   | Maint   | enance of payments   | and cure of any default on nonpri  | iority unsecured claims.   |  |   |
| Check or              | ne.   |  |  |  |  |   |
|                       | <b>✓</b>  | None. If "None"  | is checked, the rest of § 5.2 need not   | be completed or reproduced.  |  |   |
| 5.3                   | Postpe  | etition utility month  | ly payments.   |  |  |   |
| combine<br>for the li | d payme<br>fe of the  | ent for postpetition up plan. Should the uti   | vailable only if the utility provider tility services, any postpetition deline lity obtain an order authorizing a pay postpetition claims of the utility. The  | quencies, and unpaid security of<br>yment change, the debtor(s) wi                                   | leposits. The claim pay<br>ll be required to file an                       | ment will not change amended plan. These                    |
| Name o                |   | tor  | Monthly payment  | Pos  | stpetition account num   | ber   |
| Insert ad             | ditional  | claims as needed.  |  |  |  |   |
| 5.4                   | Other   | separately classifie   | d nonpriority unsecured claims.  |  |  |   |
|                       | Check   | -  |  |  |  |   |
|                       | <b>√</b>  |  | is checked, the rest of § 5.4 need not   | be completed or reproduced.  |  |   |
| Part 6:               | _   | itory Contracts and  |  | - •  |  |   |
| 6.1                   | The executory contracts and unexpired leases listed below are assumed and will be treated as specified. All other executory |  |  |  |  |   |

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contracts and unexpired leases are rejected.

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Debtor Merrett C. Adams Case number 16-70046-JAD

Check one.

None. If "None" is checked, the rest of § 6.1 need not be completed or reproduced.

#### Part 7: Vesting of Property of the Estate

7.1 Property of the estate shall not re-vest in the debtor(s) until the debtor(s) have completed all payments under the confirmed plan.

#### Part 8: General Principles Applicable to All Chapter 13 Plans

- 8.1 This is the voluntary chapter 13 reorganization plan of the debtor(s). The debtor(s) understand and agree(s) that the chapter 13 plan may be extended as necessary by the trustee (up to any period permitted by applicable law) to insure that the goals of the plan have been achieved. Notwithstanding any statement by the trustee's office concerning amounts needed to fund a plan, the adequacy of plan funding in order to meet the plan goals remains the sole responsibility of debtor(s) and debtor(s)' attorney. It shall be the responsibility of the debtor(s) and debtor(s)' attorney to monitor the plan in order to ensure that the plan remains adequately funded during its entire term.
- 8.2 Prior to the meeting of creditors, the debtor(s) shall comply with the tax return filing requirements of 11 U.S.C § 1308 and provide the trustee with documentation of such compliance by the time of the meeting. Debtor(s)' attorney or debtor(s) (if pro se) shall provide the trustee with the information needed for the trustee to comply with the requirements of 11 U.S.C. § 1302 as to the notification to be given to Domestic Support Obligation creditors, and debtor(s)' attorney or debtor(s) (if pro se) shall provide the trustee with the calculations relied upon to determine the debtor(s)' current monthly income and disposable income.
- 8.3 The debtor(s) shall have a duty to inform the trustee of any assets acquired while the chapter 13 case is pending, such as insurance proceeds, recovery on any lawsuit or claims for personal injury or property damage, lottery winnings, or inheritances. The debtor(s) must obtain prior court approval before entering into any postpetition financing or borrowing of any kind, and before selling any assets.
- 8.4 Unless otherwise stated in this plan or permitted by a court order, all claims or debts provided for by the plan to receive a distribution shall be paid by and through the trustee.
- **8.5** Percentage fees to the trustee are paid on receipts of plan payments at the rate fixed by the United States Trustee. The trustee has the discretion to adjust, interpret, and implement the distribution schedule to carry out the plan, provided that, to the extent the trustee seeks a material modification of this plan or its contemplated distribution schedule, the trustee must seek and obtain prior authorization of the court. The trustee shall follow this standard plan form sequence unless otherwise ordered by the court:

Level One: Unpaid filing fees.

Level Two: Secured claims and lease payments entitled to 11 U.S.C. § 1326(a)(1)(C) pre-confirmation adequate protection

payments.

Level Three: Monthly ongoing mortgage payments, ongoing vehicle and lease payments, installments on professional fees, and

postpetition utility claims.

Level Four: Priority Domestic Support Obligations.

Level Five: Mortgage arrears, secured taxes, rental arrears, vehicle payment arrears.

Level Six: All remaining secured, priority and specially classified claims, and miscellaneous secured arrears.

Level Seven: Allowed nonpriority unsecured claims.

Level Eight: Untimely filed nonpriority unsecured claims for which an objection has not been filed.

- As a condition to the debtor(s)' eligibility to receive a discharge upon successful completion of the plan, debtor(s)' attorney or debtor(s) (if pro se) shall file Local Bankruptcy Form 24 (Debtor's Certification of Discharge Eligibility) with the court within forty-five (45) days after making the final plan payment.
- 8.7 The provisions for payment to secured, priority, and specially classified unsecured creditors in this plan shall constitute claims in accordance with Bankruptcy Rule 3004. Proofs of claim by the trustee will not be required. In the absence of a contrary timely filed proof of claim, the amounts stated in the plan for each claim are controlling. The clerk shall be entitled to rely on the accuracy of the information contained in this plan with regard to each claim. Unless otherwise ordered by the court, if a secured, priority, or specially classified creditor timely files its own claim, then the creditor's claim shall govern, provided the debtor(s) and debtor(s)' attorney have been given notice and an opportunity to object. The trustee is authorized, without prior notice, to pay claims exceeding the amount provided in the plan by not more than \$250.
- **8.8** Any creditor whose secured claim is not modified by this plan and subsequent order of court shall retain its lien.

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| Debto                       | or Merrett C. Adams   |   | Case number  | 16-70046-JAD  |
|-----------------------------|---|---|--|---|
| 8.9                         | Any creditor whose secured claim is modified or discharged under 11 U.S.C. § 1328 or until it has whichever occurs earlier. Upon payment in accorbe released. The creditor shall promptly cause all discharged, and released.     | been paid the full a<br>dance with these te | amount to which it is entitled<br>rms and entry of a discharge | I under applicable nonbankruptcy law, e order, the modified lien will terminate and |
| 8.10                        | The provisions of Sections 8.8 and 8.9 will also a bar date. <i>LATE-FILED CLAIMS NOT PROPER DEBTOR(S) (IF PRO SE) WILL NOT BE PAIR</i> upon the debtor(s).   | RLY SERVED ON                               | THE TRUSTEE AND THE  | E DEBTOR(S)' ATTORNEY OR  |
| Part 9                      | Nonstandard Plan Provisions   |   |  |   |
| 9.1                         | Check "None" or List Nonstandard Plan Prov None. If "None" is checked, the rest of  |   | completed or reproduced.                                       |   |
| Part 1                      | 0: Signatures:  |   |  |   |
| 10.1                        | Signatures of Debtor(s) and Debtor(s)' Attorno  | ey  |  |   |
|                             | debtor(s) do not have an attorney, the debtor(s) must s(s), if any, must sign below.  | sign below; otherw                          | ise the debtor(s)' signatures                                  | are optional. The attorney for the  |
| plan(s<br>treatm            | ning this plan the undersigned, as debtor(s)' attorney ), order(s) confirming prior plan(s), proofs of claim fil ent of any creditor claims, and except as modified he . False certifications shall subject the signatories to sa | ed with the court b<br>rein, this proposed  | y creditors, and any orders of plan conforms to and is con-    | of court affecting the amount(s) or   |
| 13 pla<br>Wester<br>the sta | ng this document, debtor(s)' attorney or the debtor(s) are identical to those contained in the standard chen District of Pennsylvania, other than any nonstandard plan form shall not become operative unless atte order.         | apter 13 plan forn<br>dard provisions in    | n adopted for use by the Un<br>cluded in Part 9. It is furthe  | ited States Bankruptcy Court for the<br>r acknowledged that any deviation from      |
| <i>X</i>                    |   | X   |  |   |
|                             | Merrett C. Adams Signature of Debtor 1  | S   | ignature of Debtor 2   |   |
| ]                           | Executed on   | E   | executed on  |   |
| <b>X</b>                    | s/Lawrence W Willis   | Date  | February 10 2021   |   |

Lawrence W Willis Esq 85299 Signature of debtor(s)' attorney

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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re: : Case No. 16-70046-JAD

:

Merrett C Adams\* Linda Wolfe POA : Chapter 13

:

Debtor

•

Merrett C Adams\* Linda Wolfe POA,

Document No. 86

Movant

VS.

:

RONDA J. WINNECOUR, ESQ.

CHAPTER 13 TRUSTEE,

:

ADDITIONAL : RESPONDENT

NOTICE OF PROPOSED MODIFICATION TO CONFIRMED PLAN DATED NOVEMBER 25 2019

- 1. Pursuant to 11 U.S.C. § 1329, the Debtor(s) has filed an Amended Chapter 13 Plan dated February 10 2021, which is annexed hereto at Exhibit "A" (the "Amended Chapter 13 Plan"). A summary of the modification is set forth below in paragraphs 4 through 6 of this Notice.
- 2. All Objections to the Amended Chapter 13 Plan must be filed and served by no later than 21 days after the date of this Notice upon the Debtor(s), Chapter 13 Trustee and any creditor whose claim allowance or treatment is the subject of the Objection. Untimely Objections will not be considered. Any creditor who files a timely Objection to the Amended Chapter 13 Plan must appear at the scheduled Initial Confirmation Hearing on the Amended Chapter 13 Plan.
- 3. A virtual (via Zoom) Initial Confirmation Hearing on the Amended Chapter 13 Plan will be held on March 11, 2021, at 2:31 pm., before the Chapter 13 Trustee. The table and meeting I.D., to participate by Zoom (and telephone number and meeting I.D. to participate by telephone if you lack the ability to participate by Zoom), can be found at <a href="http://www.ch13pitt.com/calendar/">http://www.ch13pitt.com/calendar/</a> several days before the meeting. Parties are expected to familiarize themselves with the Trustee's website at <a href="http://www.ch13pitt.com/">http://www.ch13pitt.com/</a> and to comply with the procedures set forth at that site for conference participation.
- 4. Pursuant to the Amended Chapter 13 Plan, the Debtor(s) seeks to modify the Plan in the following particulars:

### Cure plan arrears and address notice of Default.

5. The proposed modification to the Plan will impact the treatment of the claims of the following creditors, and in the following particulars:

Cure plan arrears by increasing plan term. All other secured and unsecured creditors will be treated as in previous plan and orders of Court

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Debtor Merrett C. Adams Case number 16-70046-JAD

6. Debtor(s) submits that the reason(s) for the modification is (are) as follows:

Address Trustee Motion to Dismiss and cure plan arrears. Debtors family who funds the plan had suffered a loss of income in 2020 as a result of the pandemic which continued into 2021.

7. The Debtor(s) submits that the requested modification is being proposed in good faith, and not for any means prohibited by applicable law. The Debtor(s) further submits that the proposed modification complies with 11 U.S.C. §§ 1322(a), 1322(b), 1325(a) and 1329 and, except as set forth above, there are no other modifications sought by way of the Amended Chapter 13 Plan.

WHEREFORE, the Debtor(s) respectfully requests that the Court enter an Order confirming the Amended Chapter 13 Plan, and for such other relief the Court deems equitable and just.

RESPECTFULLY SUBMITTED, this 10th day of February 2021

/s/ Lawrence W Willis,
Esquire Lawrence W
Willis, Esquire PA I.D.
#85299
Willis &
Associates 201
Penn Center Blvd
Suite 310
Pittsburgh, PA 15235
412-702-1170

Email: urfreshstrt@gmail.com

PAWB Local Form 10 (12/17)

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| Fill in this infor   | nation to identify your case:  |  |   |   |  |
|--|--|--|---|---|--|
| Debtor 1   | Merrett C. Adams   |  | _   |   |  |
| D-ht2  | First Name Middle Name   | e Last Name  |   |   |  |
| Debtor 2<br>(Spouse, if filing   | First Name Middle Name   | e Last Name  | _   |   |  |
|  | nkruptcy Court for the:  | WESTERN DISTRICT OF  | <b>√</b>  | Check if th   | nis is an amended plan, and  |
|  |  | PENNSYLVANIA   |   |   |  |
|  | _  |  | _   | list below  | the sections of the plan tha   |
| Case number:   | 16-70046-JAD   |  |   | have been   | •  |
| (If known)   |  |  |   |   |  |
|  |  |  |   |   |  |
| Western Dist   | rict of Pennsylvania   |  |   |   |  |
| Chapter 13   | Plan Dated: February 10  | , 2020   |   |   |  |
|  |  |  |   |   |  |
| Part 1: Notice   | .a   |  |   |   |  |
| rait I. Notice   | · · · · · · · · · · · · · · · · · · ·  |  |   |   |  |
| To Debtor(s):  |  | that may be appropriate in some cases, bu  |   |   |  |
|  |  | appropriate in your circumstances. Plans   |   |   |  |
|  | runngs may not be confirm  | nable. The terms of this plan control unles  | s otnerwise ora   | erea by the   | court.   |
|  | In the following notice to cre   | editors, you must check each box that applie   | S   |   |  |
| o Creditors:   | YOUR RIGHTS MAY BE A   | AFFECTED BY THIS PLAN. YOUR CLAI   | M MAY BE RE   | DUCED, M  | ODIFIED, OR  |
|  | ELIMINATED.  |  |   | ,   | ,  |
|  | You should read this plan ca   | refully and discuss it with your attorney if y   | ou have one in th   | is hankrunta  | cy case. If you do not have  |
|  | an attorney, you may wish to   |  | ou nuve one in ti   | ns ounitrupt  | ey case. If you do not have  |
|  | an accorney, you may wish co   | consult one.   |   |   |  |
|  |  |  |   | SION OF T   | HIC DI AN VOU OD   |
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| Debtor  |            | Merrett C. Adams  |  | Case number   | 16-70046-JAD   |  |  |
|---------|------------|---|--|---|--|--|--|
| 2.2 Add | litional 1 | payments.   |  |   |  |  |  |
|         |            |   | ha balanga of \$ shall be fully  | y poid by the Trustee to the Cle  | ork of the Denkrunter, cour  | et form the first  |  |
|         |            | available funds.  | he balance of \$ shall be fully  | y paid by the Trustee to the Cle  | ik of the Bankruptcy cour  | t form the first   |  |
| Che     | ck one.    |   |  |   |  |  |  |
|         | <b>✓</b>   | None. If "None" is che  | ecked, the rest of § 2.2 need not be   | e completed or reproduced.  |  |  |  |
| 2.3     |            | otal amount to be paid into the plan (plan base) shall be computed by the trustee based on the total amount of plan payments ny additional sources of plan funding described above. |  |   |  |  |  |
| Part 3: | Trea       | tment of Secured Claims   |  |   |  |  |  |
| 3.1     | Maint      | tenance of payments and   | cure of default, if any, on Long-  | -Term Continuing Debts.   |  |  |  |
|         | Check      | one.  |  |   |  |  |  |
|         | <u></u> ✓  | The debtor(s) will main<br>required by the applicab<br>trustee. Any existing arr<br>from the automatic stay   | ked, the rest of Section 3.1 need nation the current contractual installable contract and noticed in conformerange on a listed claim will be pais ordered as to any item of collate paragraph as to that collateral will | ment payments on the secured of<br>nity with any applicable rules. I<br>aid in full through disbursemen<br>eral listed in this paragraph, the | claims listed below, with a These payments will be dits by the trustee, without i en, unless otherwise order | sbursed by the<br>nterest. If relief<br>ed by the court, |  |
| Name    | of Cred    | itor  | Collateral   | Current installment payment   | Amount of arrearage (if any)   | Start date<br>(MM/YYYY)                                  |  |
|         |            |   |  | (including escrow)<br>\$419.99*Amended  |  |  |  |
|         |            |   |  | Claim 2-2   |  |  |  |
|         |            |   | 658 Bethel Church Road   | 452.04 *Effective<br>9/9/18   |  |  |  |
|         |            |   | Marion Center, PA 15759  |   | 404.40   |  |  |
|         |            |   | Indiana County<br>Residence  | 432.90* Effective<br>9/1/19   | 484.49   |  |  |
| LSF9 N  | MASTE      | R PARTICIPATION   | Fair Market Value<br>Determined By   | \$435.91*   |  |  |  |
| TRUS    |            | 1.  | Comparable Sales   | Effective 3/9/21  |  |  |  |
|         |            | claims as needed.   |  |   |  |  |  |
| 3.2     | Reque      | est for valuation of secur  | ity, payment of fully secured cla  | ims, and modification of und  | ersecured claims.  |  |  |
|         | Check      | one.  |  |   |  |  |  |
|         | <b>V</b>   | <b>None.</b> If "None" is che   | ecked, the rest of § 3.2 need not be   | e completed or reproduced.  |  |  |  |
| 3.3     | Secur      | ed claims excluded from   | 11 U.S.C. § 506.   |   |  |  |  |
|         | Check      |   | ecked, the rest of Section 3.3 need  | not be completed or reproduce   | ed.  |  |  |
| 3.4     | ,          | avoidance.  |  |   |  |  |  |
| Check o |            |   |  |   |  |  |  |
|         | <b>√</b>   |   | ecked, the rest of § 3.4 need not be plicable box in Part 1 of this plan   |   | e remainder of this section  | n will be  |  |

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3.5

Chapter 13 Plan

Surrender of collateral.

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| Debtor             | Merrett C.  | Adams   |                                      | Case number           | 16-70046-JAD  |                       |
|--------------------|---|---|--------------------------------------|-----------------------|---|-----------------------|
|                    | Check one.  |   |                                      |                       |   |                       |
|                    | ✓ None. If '  | 'None" is checked, the rest                               | of § 3.5 need not be compl           | eted or reproduced.   |   |                       |
| 3.6                | Secured tax claims  | s.  |                                      |                       |   |                       |
| Name o             | f taxing authority  | Total amount of claim                                     | Type of tax                          |                       | Identifying number(s) if collateral is real estate              | Tax periods           |
| Indiana<br>Claim l | County Tax<br>Bureau  | \$1155.30   | Description: (1-1)<br>property taxes |                       |   |                       |
| Insert ad          | ditional claims as ne   | eded.   |                                      |                       |   |                       |
|                    |   | he Internal Revenue Servic<br>of the date of confirmation |                                      | ylvania and any oth   | er tax claimants shall bear i                                   | nterest at            |
| Part 4:            | <b>Treatment of Fee</b>   | s and Priority Claims                                     |                                      |                       |   |                       |
| 4.1                | General   |   |                                      |                       |   |                       |
|                    | Trustee's fees and a in full without post   |   | including Domestic Suppo             | rt Obligations other  | than those treated in Section                                   | 1 4.5, will be paid   |
| 4.2                | Trustee's fees  |   |                                      |                       |   |                       |
|                    | and publish the pre   | vailing rate on the court's v                             |                                      | n the debtor(s)' atto | stee shall compute the truste<br>orney or debtor (if pro se) to |                       |
| 4.3                | Attorney's fees.  |   |                                      |                       |   |                       |
|                    | Attorney's fees are payable to Lawrence W Willis Esq 85299. In addition to a retainer of \$1,000.00 (of which \$ 0.00 was a payment to reimburse costs advanced and/or a no-look costs deposit) already paid by or on behalf of the debtor, the amount of \$3,000.00 is to be paid at the rate of \$428.57 per month. Including any retainer paid, a total of \$ 4,000.00 in fees and costs reimbursement has been approved by the court to date, based on a combination of the no-look fee and costs deposit and previously approved application(s) for compensation above the no-look fee. An additional \$ 1,000.00 will be sought through a fee application to be filed and approved before any additional amount will be paid through the plan, and this plan contains sufficient funding to pay that additional amount, without diminishing the amounts required to be paid under this plan to holders of allowed unsecured claims. |   |                                      |                       |   |                       |
|                    |   | gh participation in the court                             |                                      |                       | c) is being requested for ser<br>no-look fee in the total amo   |                       |
| 4.4                | Priority claims not   | treated elsewhere in Part                                 | 4.                                   |                       |   |                       |
| Insert ad          | ✓ None. If 'ditional claims as ne   |   | of Section 4.4 need not be           | completed or reproc   | luced.  |                       |
| 4.5                | <b>Priority Domestic</b>  | Support Obligations not                                   | assigned or owed to a gov            | ernmental unit.       |   |                       |
|                    |   |   |                                      |                       | ourt order(s) and leaves this<br>bligations through existing s  |                       |
|                    | Check here if the   | is payment is for prepetition                             | on arrearages only.                  |                       |   |                       |
| (specify           | f Creditor<br>the actual payee, e.g   | Description<br>g. PA SCDU)                                | n                                    | Claim                 | Montl<br>pro ra   | hly payment or<br>ata |
| None               |   |   |                                      |                       |   |                       |

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Chapter 13 Plan

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|                       |  |   | Document   | Page 14 01 16   |  |   |
|-----------------------|--|---|--|---|--|---|
| Debtor                | Mer  | rett C. Adams                               |  | _ Case numb   | er <b>16-70046-JAD</b>                                       |   |
| Insert ad             | ditional clain   | ns as needed.                               |  |   |  |   |
| 4.6                   | Check one.   |   | s assigned or owed to a governmecked, the rest of § 4.6 need not   | _   |  |   |
| 4.7                   | Priority un  | secured tax claims                          | paid in full.  |   |  |   |
| Name o                | f taxing auth  | nority T                                    | otal amount of claim   | Type of Tax   | Interest rate (0% If blank)                                  | Tax Periods                                 |
| -NONE                 | ļ <b>-</b>   |   |  |   |  |   |
| Insert ad             | ditional clain   | ns as needed.                               |  |   |  |   |
| Part 5:               | Treatment  | t of Nonpriority U                          | nsecured Claims  |   |  |   |
| 5.1                   | Nonpriority  | y unsecured claims                          | s not separately classified.   |   |  |   |
|                       | Debtor(s) E  | STIMATE(S) that a                           | total of \$0.00 will be available  | for distribution to nonprior                              | rity unsecured creditors.                                    |   |
|                       |  |   | S) that a MINIMUM of \$ <b>0.00</b> sh a set forth in 11 U.S.C. § 1325(a)  |   | nsecured creditors to comp                                   | ly with the liquidation                     |
|                       | The total pool of funds estimated above is <b>NOT</b> the <b>MAXIMUM</b> amount payable to this class of creditors. Instead, the actual pool of funds available for payment to these creditors under the plan base will be determined only after audit of the plan at time of completion. The estimated percentage of payment to general unsecured creditors is <b>0.00</b> %. The percentage of payment may change, based upon the total amount of allowed claims. Late-filed claims will not be paid unless all timely filed claims have been paid in full. Thereafter, all late-filed claims will be paid pro-rata unless an objection has been filed within thirty (30) days of filing the claim. Creditors not specifically identified elsewhere in this plan are included in this class. |   |  |   |  |   |
| 5.2                   | Maintenan  | ce of payments and                          | d cure of any default on nonpr   | ority unsecured claims.                                   |  |   |
| Check or              | ne.  |   |  |   |  |   |
|                       | ✓ No   | one. If "None" is ch                        | ecked, the rest of § 5.2 need not  | be completed or reproduce                                 | ed.  |   |
| 5.3                   | Postpetition   | n utility monthly p                         | ayments.   |   |  |   |
| combine<br>for the li | d payment for<br>fe of the plan  | r postpetition utility . Should the utility | able only if the utility provider a services, any postpetition delin-<br>obtain an order authorizing a pay-<br>petition claims of the utility. The | quencies, and unpaid secur<br>yment change, the debtor(s) | ity deposits. The claim pay<br>) will be required to file an | ment will not change<br>amended plan. These |
| Name o                | of Creditor  |   | Monthly payment  |   | Postpetition account nun                                     | nber  |
| Insert ad             | ditional clain   | ns as needed.                               |  |   |  |   |
| 5.4                   | Other sepa   | rately classified no                        | onpriority unsecured claims.   |   |  |   |
|                       | Check one.   |   |  |   |  |   |
|                       | ✓ No   | one. If "None" is ch                        | ecked, the rest of § 5.4 need not  | be completed or reproduce                                 | ed.  |   |
| Part 6:               | Executory  | Contracts and Un                            | expired Leases   |   |  |   |
| 6.1                   | The executory contracts and unexpired leases listed below are assumed and will be treated as specified. All other executory  |   |  |   |  |   |

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contracts and unexpired leases are rejected.

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Debtor Merrett C. Adams Case number 16-70046-JAD

Check one.

None. If "None" is checked, the rest of § 6.1 need not be completed or reproduced.

#### Part 7: Vesting of Property of the Estate

7.1 Property of the estate shall not re-vest in the debtor(s) until the debtor(s) have completed all payments under the confirmed plan.

#### Part 8: General Principles Applicable to All Chapter 13 Plans

- 8.1 This is the voluntary chapter 13 reorganization plan of the debtor(s). The debtor(s) understand and agree(s) that the chapter 13 plan may be extended as necessary by the trustee (up to any period permitted by applicable law) to insure that the goals of the plan have been achieved. Notwithstanding any statement by the trustee's office concerning amounts needed to fund a plan, the adequacy of plan funding in order to meet the plan goals remains the sole responsibility of debtor(s) and debtor(s)' attorney. It shall be the responsibility of the debtor(s) and debtor(s)' attorney to monitor the plan in order to ensure that the plan remains adequately funded during its entire term.
- 8.2 Prior to the meeting of creditors, the debtor(s) shall comply with the tax return filing requirements of 11 U.S.C § 1308 and provide the trustee with documentation of such compliance by the time of the meeting. Debtor(s)' attorney or debtor(s) (if pro se) shall provide the trustee with the information needed for the trustee to comply with the requirements of 11 U.S.C. § 1302 as to the notification to be given to Domestic Support Obligation creditors, and debtor(s)' attorney or debtor(s) (if pro se) shall provide the trustee with the calculations relied upon to determine the debtor(s)' current monthly income and disposable income.
- 8.3 The debtor(s) shall have a duty to inform the trustee of any assets acquired while the chapter 13 case is pending, such as insurance proceeds, recovery on any lawsuit or claims for personal injury or property damage, lottery winnings, or inheritances. The debtor(s) must obtain prior court approval before entering into any postpetition financing or borrowing of any kind, and before selling any assets.
- 8.4 Unless otherwise stated in this plan or permitted by a court order, all claims or debts provided for by the plan to receive a distribution shall be paid by and through the trustee.
- **8.5** Percentage fees to the trustee are paid on receipts of plan payments at the rate fixed by the United States Trustee. The trustee has the discretion to adjust, interpret, and implement the distribution schedule to carry out the plan, provided that, to the extent the trustee seeks a material modification of this plan or its contemplated distribution schedule, the trustee must seek and obtain prior authorization of the court. The trustee shall follow this standard plan form sequence unless otherwise ordered by the court:

Level One: Unpaid filing fees.

Level Two: Secured claims and lease payments entitled to 11 U.S.C. § 1326(a)(1)(C) pre-confirmation adequate protection

payments.

Level Three: Monthly ongoing mortgage payments, ongoing vehicle and lease payments, installments on professional fees, and

postpetition utility claims.

Level Four: Priority Domestic Support Obligations.

Level Five: Mortgage arrears, secured taxes, rental arrears, vehicle payment arrears.

Level Six: All remaining secured, priority and specially classified claims, and miscellaneous secured arrears.

Level Seven: Allowed nonpriority unsecured claims.

Level Eight: Untimely filed nonpriority unsecured claims for which an objection has not been filed.

- As a condition to the debtor(s)' eligibility to receive a discharge upon successful completion of the plan, debtor(s)' attorney or debtor(s) (if pro se) shall file Local Bankruptcy Form 24 (Debtor's Certification of Discharge Eligibility) with the court within forty-five (45) days after making the final plan payment.
- 8.7 The provisions for payment to secured, priority, and specially classified unsecured creditors in this plan shall constitute claims in accordance with Bankruptcy Rule 3004. Proofs of claim by the trustee will not be required. In the absence of a contrary timely filed proof of claim, the amounts stated in the plan for each claim are controlling. The clerk shall be entitled to rely on the accuracy of the information contained in this plan with regard to each claim. Unless otherwise ordered by the court, if a secured, priority, or specially classified creditor timely files its own claim, then the creditor's claim shall govern, provided the debtor(s) and debtor(s)' attorney have been given notice and an opportunity to object. The trustee is authorized, without prior notice, to pay claims exceeding the amount provided in the plan by not more than \$250.
- **8.8** Any creditor whose secured claim is not modified by this plan and subsequent order of court shall retain its lien.

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| Debtor             | Merrett C. Adams  | Case number  | 16-70046-JAD   |  |  |  |  |
|--------------------|---|--|--|--|--|--|--|
| 8.9                | Any creditor whose secured claim is modified or whose sharped under 11 U.S.C. § 1328 or until it has be whichever occurs earlier. Upon payment in accorda be released. The creditor shall promptly cause all m discharged, and released.  | een paid the full amount to which it is entitled<br>ance with these terms and entry of a discharge | d under applicable nonbankruptcy law,<br>e order, the modified lien will terminate and |  |  |  |  |
| 8.10               | The provisions of Sections 8.8 and 8.9 will also apply to allowed secured, priority, and specially classified unsecured claims filed after the bar date. <i>LATE-FILED CLAIMS NOT PROPERLY SERVED ON THE TRUSTEE AND THE DEBTOR(S)' ATTORNEY OR DEBTOR(S) (IF PRO SE) WILL NOT BE PAID.</i> The responsibility for reviewing the claims and objecting where appropriate is placed upon the debtor(s). |  |  |  |  |  |  |
| Part 9:            | Nonstandard Plan Provisions   |  |  |  |  |  |  |
| 9.1                | Check "None" or List Nonstandard Plan Provisi  None. If "None" is checked, the rest of Pa   |  |  |  |  |  |  |
| Part 10            | : Signatures:   |  |  |  |  |  |  |
| 10.1               | Signatures of Debtor(s) and Debtor(s)' Attorney   |  |  |  |  |  |  |
|                    | ebtor(s) do not have an attorney, the debtor(s) must sign), if any, must sign below.  | gn below; otherwise the debtor(s)' signatures  | are optional. The attorney for the   |  |  |  |  |
| plan(s),o          | ing this plan the undersigned, as debtor(s)' attorney or<br>order(s) confirming prior plan(s), proofs of claim filed<br>at of any creditor claims, and except as modified here<br>False certifications shall subject the signatories to san   | d with the court by creditors, and any orders on, this proposed plan conforms to and is con        | of court affecting the amount(s) or  |  |  |  |  |
| 13 plan<br>Western | g this document, debtor(s)' attorney or the debtor(s) are identical to those contained in the standard chap District of Pennsylvania, other than any nonstandadard plan form shall not become operative unless it e order.  | pter 13 plan form adopted for use by the Un<br>ard provisions included in Part 9. It is furthe     | ited States Bankruptcy Court for the er acknowledged that any deviation from           |  |  |  |  |
| X                  |   | <i>X</i>   |  |  |  |  |  |
|                    | errett C. Adams<br>gnature of Debtor 1  | Signature of Debtor 2  |  |  |  |  |  |
|                    | xecuted on  | Executed on  |  |  |  |  |  |
| <b>X</b> /s/       | Lawrence W Willis   | Date February 10 2021  |  |  |  |  |  |

Lawrence W Willis Esq 85299 Signature of debtor(s)' attorney